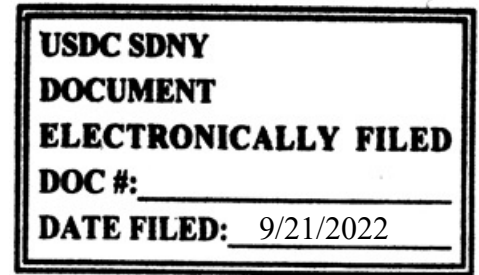


September 20, 2022

Via ECF

Honorable Stewart D. Aaron
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007



Re: *Allianz Global Investors GmbH, et al. v. Bank of America Corp., et al.*,
No. 18 Civ. 10364 (LGS) (SDA) (S.D.N.Y. 2018)

Dear Judge Aaron,

Pursuant to the Court's August 16, 2022 order, Dkt. 1145, the parties jointly write to report that there are no ripe discovery issues for the Court to address at the September 22, 2022 conference. Should the Court nonetheless wish to proceed with the conference, the parties would be happy to do so.

The parties also jointly write to advise the Court that, while they have been actively engaged in conducting depositions, due to scheduling difficulties presented by witness and counsel availability, the parties have agreed to conduct a number of depositions after the September 23, 2022 fact deposition deadline, Dkt. 1069. The parties are working cooperatively to conduct these depositions as promptly as possible and believe that an extension to the end of October would be sufficient to do so. Accordingly, the parties respectfully request that the September 23 deadline to complete fact depositions be extended to October 31, 2022 as to previously-noticed depositions that the parties have mutually agreed to conduct after September 23. The parties (separately or jointly) have previously requested extensions of the fact discovery deadlines five times, and the Court granted each request. See Dkts. 541, 770, 819, 980, 985, 1069.

Respectfully submitted,

/s/ Justin L. Brooke
Justin L. Brooke
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, N.Y. 10019
(212) 403-1000
JLBrooke@wlrk.com

*Counsel for Defendants Morgan Stanley,
Morgan Stanley & Co., LLC, and Morgan
Stanley & Co. International plc*

/s/ Daniel L. Brockett
Daniel L. Brockett
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor,
New York, New York 10010
Tel: (212) 849-7000
danbrockett@quinnemanuel.com

Counsel for Plaintiffs

CC: All counsel of record (via ECF)

ENDORSEMENT: The parties' joint request to extend the deadline to complete fact depositions until 10/31/2022 is GRANTED. The 9/22/2022 telephone conference is canceled. No later than 9/30/2022, the parties shall file a joint letter indicating if the parties wish the Court to schedule another conference to address any discovery issues that arise (and, if so, shall provide three available dates) or if the parties would prefer to schedule a conference only when the need arises. SO ORDERED.

Dated: 9/21/2022

